

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

ALEX VEMAN,

Plaintiff,

v.

CITY OF EASTON, EASTON POLICE
DEPARTMENT, OFFICER MATTHEW
SNYDER, in his individual and official capacities,
EASTON HOSPITAL, NORTHAMPTON
COUNTY, NORTHAMPTON COUNTY
DEPARTMENT OF CORRECTIONS, and
NORTHAMPTON COUNTY ASSISTANT
DISTRICT ATTORNEY ROBERT EYER, in his
individual and official capacities,

Defendant(s).

Civ. No. 5:25-cv-00291-JLS

MOTION FOR PRO HAC VICE ADMISSION OF ANDREW ROZYNSKI

NOW COMES Mary Vargas, counsel of record for Plaintiff Alex Veman, and respectfully moves this Honorable Court for the admission of Andrew Rozynski, Esq., to appear pro hac vice in this matter pursuant to the Judge's Individual practice rules. In support of this motion, the undersigned states the following:

1. Attorney's Admission:

Andrew Rozynski is a licensed attorney admitted to practice law in the State of New York, New Jersey, and numerous federal courts, as outlined in the already filed application (ECF 3). He is in good standing with each court to which he has been admitted.

2. Reason for Admission:

The Plaintiff, Alex Veman, seeks the participation of Andrew Rozynski in this matter because of his extensive experience in legal issues concerning discrimination against individuals who are Deaf. His involvement is crucial to ensure that this case's unique legal and cultural aspects are addressed with the highest level of competence and professionalism.

3. Qualifications:

Andrew Rozynski is a nationally recognized civil rights attorney with significant experience litigating cases involving discrimination against Deaf individuals. As a CODA (Child of Deaf Adults) and a fluent user of American Sign Language, Mr. Rozynski possesses an exceptional understanding of the systemic barriers faced by the Deaf community. His extensive experience involves cases involving critical issues of accessibility, effective communication, and equal rights under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Affordable Care Act, and the Fair Housing Act.

4. Filing Fee:

The requisite filing fee for this pro hac vice admission has been paid in full, as required by the Court.

5. Compliance:

Mr. Rozynski will comply with all local rules, policies, and procedures of this Court and agrees to associate with the undersigned counsel of record, who is admitted to practice before this Court, for all purposes in this matter.

WHEREFORE, for the foregoing reasons, the undersigned respectfully requests that this Court grant the motion for Andrew Rozynski, Esq., to appear pro hac vice in this case.

Dated: January 27, 2025

Respectfully submitted,

/s/ Mary Vargas

Mary Vargas
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CERTIFICATE OF SERVICE

I certify that the forgoing motion was served as follows:

City of Easton: 123 South Third Street, Easton, PA 18042

Easton Police Department: 46 Lothrop St. North Easton, MA 02356

Officer Matthew Snyder: 46 Lothrop St. North Easton, MA 02356

Easton Hospital: 801 Ostrum St. Bethlehem, PA 18015

Northampton County: 669 Washington Street Easton, PA 18042

Northampton County Department of Corrections: 669 Washington Street Easton, PA 18042

Northampton County Assistant District Attorney Robert Eyer: 669 Washington Street Easton, PA 18042

/s/ Mary Vargas

Mary Vargas

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